

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

GBM Global Holding Company Limited

Petitioner,

v.

The Unidentified Individuals Listed On
Schedule A,

Defendants

Case No. 1:21-cv-06284-AJN

**Supplemental Declaration of Angus F. Ni in
Support of Petitioner's Motion for
Temporary Restraining Order and Show
Cause Order**

I, **ANGUS F. NI**, declare as follows:

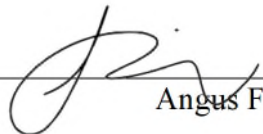
1. I am counsel for Petitioner in the above-captioned action.

2. As I had represented at the hearing on July 27, 2021, Petitioner, a foreign entity, will shortly commence arbitration pursuant to the arbitration clause in the agreement that all Defendants accepted when signing up for accounts on its exchange.

3. Petitioner will assert in arbitration claims for breach of contract, as well as common law fraud, unjust enrichment, and conversion.

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge, information, and belief.

Signed this July 27, 2021

By:  _____
Angus F. Ni

AFN LAW PLLC
41 Madison Ave, 31st Floor,
New York, NY 10017
(646) 453-7294
angus@afnlegal.com
Attorney for Petitioner